

1 PHILLIP A. TALBERT
2 United States Attorney
3 KEVIN C. KHASIGIAN
4 Assistant United States Attorney
5 501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

6
7
8
9 Attorneys for the United States
10
11

12
13
14
15 IN THE UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
17
18
19
20
21
22
23

24 UNITED STATES OF AMERICA,

25 Plaintiff,

26 v.

27 2018 MASERATI GRAN TURISMO,
LICENCE NUMBER 8EOX182, VIN:
ZAM45VLA3J0253945¹,

28 APPROXIMATELY \$68,119.88 SEIZED
FROM E*TRADE ACCOUNT NUMBER
5147-0717, HELD IN THE NAME OF
VIKEN YEPREMIAN, and

APPROXIMATELY \$71,207.76 SEIZED
FROM GOLDMAN SACHS, MARCUS
ONLINE SAVINGS ACCOUNT NUMBER
300007772619, HELD IN THE NAME OF
VIKEN YEPREMIAN,

Defendants.

Case No. 1:23-MC-00086-NODJ

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America, potential claimants Viken Yepremian and Sonia Yepremian (“Viken” and “Sonia”), by and through their respective counsel, and potential claimant and Mardig Yepremian (“Mardig”), appearing *in propria persona* (collectively “claimants”) as follows:

¹ This asset was returned to Viken and Mardig Yepremian in exchange for \$50,250.00 and is the substitutes *res.*

1. On or about June 6, 2023, claimants Viken and Sonia filed claims in the administrative
2 forfeiture proceeding with the Federal Bureau of Investigation (“FBI”) with respect to the Approximately
3 \$71,207.76 seized from Goldman Sachs, Marcus Online Savings account number 300007772619, held in
4 the name of Viken Yeremian and Approximately \$68,119.88 seized from E*Trade account number
5 5147-0717, held in the name of Viken Yeremian which were seized on March 10, 2023. Claims were
6 filed by Viken and Mardig on or about June 6, 2023, in the administrative forfeiture proceeding with the
7 FBI with respect to the 2018 Maserati Gran Turismo, License Number 8EOX182, VIN:
8 ZAM45VLA3J0253945, which was seized on March 16, 2023 (hereafter collectively the “defendant
9 assets”).

10. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. §
11 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
12 defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants have filed a
13 claim to the defendant assets as required by law in the administrative forfeiture proceeding.

14. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
15 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are
16 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
17 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
18 That deadline was September 4, 2023.

19. By Stipulation and Order filed August 30, 2023, the parties stipulated to extend to
20 November 30, 2023, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
22 to forfeiture.

23. By Stipulation and Order filed November 8, 2023, the parties stipulated to extend to
24 February 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture
25 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
26 to forfeiture.

27. By Stipulation and Order filed February 27, 2024, the parties stipulated to extend to May
28 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

2 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
3 October 25, 2024, the time in which the United States is required to file a civil complaint for forfeiture
4 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
5 to forfeiture.

6 8. Accordingly, the parties agree that the deadline by which the United States shall be required
7 to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that
8 the defendant assets are subject to forfeiture shall be extended to October 25, 2024.

9 Dated: May 9, 2024

PHILLIP A. TALBERT
United States Attorney

11 By: /s/ Kevin C. Khasigian
12 KEVIN C. KHASIGIAN
13 Assistant United States Attorney

14 Dated: May 8, 2024

/s/ Alaleh Kamran
15 ALALEH KAMRAN
16 Attorney for potential claimants
17 Viken Yepremian and Sonia Yepremian
18 (Signature authorized by email on 5/8/24)

19 Dated: May 8, 2024

/s/ Mardig Yepremian
20 MARDIG YEPREMIAN
21 Potential Claimant
22 Appearing *in propria persona*
23 9544 N. Larkspur Avenue
24 Fresno, CA 93720
25 (Original signature retained by attorney)

26 **IT IS SO ORDERED.**

27 DATED: May 13, 2024.

28 
29 CHIEF UNITED STATES DISTRICT JUDGE